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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
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Case No.: 5:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
 MOTION TO CONSIDER WHETHER
 PORTIONS OF MOTION FOR LEAVE
 TO AMEND COMPLAINT SHOULD BE
 SEALED**

The Honorable Yvonne Gonzalez Rogers
 Courtroom 1 - 4th Floor
 Date: March 15, 2022
 Time: 2:00 p.m.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Rule 15(a) Motion for Leave to File their Third Amended Complaint ("Plaintiffs' Motion").

Plaintiffs reserve their right to oppose Google's request to seal.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Plaintiffs' Motion	Google	Portions highlighted in yellow on Pages 3, 5, 6, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25	Refers to material designated "Confidential" and "Highly Confidential" pursuant to the Protective Order
Declaration of Mark C. Mao in Support of Plaintiffs' Motion for Leave to File their Third Amended Complaint ("Mao Decl.")	Google	Portions highlighted in yellow within paragraphs 6, 8, 9, 10	Refers to material designated "Confidential" and "Highly Confidential" pursuant to the Protective Order
Exhibit 1 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
Exhibit 2 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
Exhibit 3 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
Exhibit 4 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
Exhibit 5 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
Exhibit 6 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order

1	Exhibit 7 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
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3	Exhibit 8 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
4				
5	Exhibit 9 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
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8	Exhibit 10 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
9				
10	Exhibit 11 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
11				
12	Exhibit 12 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
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14				
15	Exhibit 13 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
16				
17	Exhibit 14 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
18				
19	Exhibit 15 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
20				
21				
22	Exhibit 16 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
23				
24	Exhibit 17 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
25				
26	Exhibit 18 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
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1	Exhibit 19 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
2				
3	Exhibit 20 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
4				
5	Exhibit 21 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
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7				
8	Exhibit 22 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
9				
10	Exhibit 23 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
11				
12	Exhibit 24 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
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14				
15	Exhibit 25 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
16				
17	Exhibit 26 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
18				
19	Exhibit 27 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
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21				
22	Exhibit 28 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
23				
24	Exhibit 29 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
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26	Exhibit 30 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
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1	Exhibit 31 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
2				
3	Exhibit 32 to Mao Decl.	Google	Entirety	Transcript designated "Confidential" pursuant to the Protective Order
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5	Exhibit 33 to Mao Decl.	Google	Entirety	Transcript designated "Confidential" pursuant to the Protective Order
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8	Exhibit 34 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
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10	Exhibit 35 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
11				
12	Exhibit 36 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
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14				
15	Exhibit 37 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
16				
17	Exhibit 38 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
18				
19	Exhibit 39 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
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21				
22	Exhibit 40 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
23				
24	Exhibit 41 to Mao Decl.	Google	Entirety	Document designated "Highly Confidential" pursuant to the Protective Order
25				
26	Exhibit 42 to Mao Decl.	Google	Entirety	Document designated "Confidential" pursuant to the Protective Order
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1 2 3 4	Exhibit 43 to Mao Decl.	Google	Entirety	Interrogatory Response designated "Highly Confidential" pursuant to the Protective Order
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5 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
6 responsibility to establish that its designated material is sealable.

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8 Dated: February 3, 2022

Respectfully submitted,

9 By: /s/Amanda Bonn

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